

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION

SANDRA FAY GIPSON, as Administratrix of,  
and Personal Representative on Behalf  
of the Wrongful Death Beneficiaries of  
CHARLES ELLIOTT MCGREW, Deceased PLAINTIFF

VS. CIVIL ACTION NO. 3:16-cv-624 DPJ-FKB  
  
MANAGEMENT & TRAINING CORPORATION,  
and JOHN AND JANE DOES 1-100 DEFENDANTS

30(b)(6) DEPOSITION OF MANAGEMENT & TRAINING  
CORPORATION

GIVEN BY REPRESENTATIVE  
MARJORIE BROWN

Deposition Taken at the Instance of Plaintiff  
In the Offices of Adams & Reese  
Ridgeland, Mississippi  
On the 9th day of May, 2017  
Commencing at 12:15 p.m.

REPORTED BY: MOLLY B. EATON, RPR, CCR #1722

BOND & BENOIST  
Post Office Box 1576  
Madison, Mississippi 39130  
(601) 951-8308

1 cells very much.

2 Q And what primarily does the inmate  
3 population consist of at EMCF? What type of  
4 offenders?

5 A At the time of the incident?

6 Q Yes.

7 A It was a mixture of close custody and  
8 medium, and we also had some minimum.

9 Q And within that prison population, were  
10 there a lot of mentally ill offenders in East  
11 Mississippi?

12 A East has been designated as a unit where a  
13 certain level of mentally ill inmates are placed.

14 Q What percentage of the population is  
15 considered to be mentally ill?

16 A I don't have that number.

17 Q I've seen a figure as high as 60 percent.  
18 Would that sound about right?

19 A I can't speculate on that.

20 Q Okay. But anyway, you have -- and I know  
21 East Mississippi, EMCF, has been designated to house  
22 mentally ill prisoners. Is there a specific unit  
23 where those inmates are housed?

24 A Yes.

25 Q Which one is that?

1 minute chronologically. Were you aware that prior  
2 to Mr. McGrew's death that Mr. Bullock's father  
3 called East Mississippi and talked to someone there  
4 about his son's situation?

5 MR. GARNER: Object to the form.

6 A I was not aware of that.

7 BY MR. MULLINS:

8 Q And I don't know that it happened. That's  
9 just something that's been said by Mr. Bullock. I  
10 just didn't know if you were aware. Is that fair  
11 enough?

12 A Yes.

13 Q Okay. Why was Mr. Bullock moved to East  
14 Mississippi?

15 A I can't recall at this time, but I thought  
16 it was something to do with his PC needs.

17 Q And why would he be moved to East  
18 Mississippi because of his PC needs, protective  
19 custody needs?

20 A I'm sorry. I'm not aware of why East  
21 Mississippi was chosen.

22 Q Let's talk about the gang networking. Do  
23 gangs in other prisons in Mississippi, do they  
24 communicate with each other?

25 A According to Mr. Bullock's statements,

1           A     When an inmate requests protective custody  
2 needs and we verify that those are indeed a reason  
3 to separate him from the rest of the population,  
4 there is a unit that we place them on.

5           Q     What unit?

6           A     So I do not know at the time if this was  
7 the same unit, but it would be Housing Unit 6.

8           Q     Okay. When you've got an offender --  
9 let's just stick with Mr. Bullock. Mr. Bullock was  
10 in protective custody at Walnut Grove for the issues  
11 regarding a gang debt. Correct?

12          A     Yes.

13          Q     He was then taken from Walnut Grove and  
14 put in East Mississippi, which is another prison  
15 controlled by MTC, obviously. Why was he not put in  
16 protective custody at East Mississippi, if you know?

17          A     I don't know.

18          Q     Would it be normal for an inmate who is on  
19 PC in one prison, if he's transferred, to be in PC  
20 in the other prison?

21          A     That is not normal.

22          Q     Okay. Why not?

23          A     The whole purpose, we don't want folks to  
24 sit around in protective custody, particularly if  
25 they have any amount of time. So, again,

1 705 --

2 MR. MULLINS: And we can go ahead and mark  
3 this as Exhibit 9.

4 (Exhibit 9 marked for identification and  
5 attached hereto.)

6 BY MR. MULLINS:

7 Q Mr. Bullock was medium custody. Correct?

8 A That's what it looks like here, yes.

9 (Exhibit 10 marked for identification and  
10 attached hereto.)

11 BY MR. MULLINS:

12 Q And Exhibit 10, Mr. McGrew was also medium  
13 custody?

14 A Yes.

15 Q And MTC does not classify prisoners.  
16 Correct?

17 A That is correct.

18 Q MDOC does the classification. Correct?

19 A Yes.

20 Q And they have a point system?

21 A Yes.

22 Q And they simply go through and add up  
23 points based on what they were originally charged  
24 with and any type of --

25 A Disciplinary reports.

1 MR. GARNER: I've got a couple of  
2 questions, actually, if you can believe it. Are  
3 you done?

4 MR. MULLINS: Yeah.

5 MR. GARNER: Okay.

6 CROSS-EXAMINATION

7 BY MR. GARNER:

8 Q Marjorie, this Exhibit 11, I just want to  
9 make sure I'm clear on this. This is what's titled  
10 at the top, "MDOC Initial Classification Score  
11 Sheet." Correct?

12 A Yes.

13 Q Is this something that's prepared by the  
14 MDOC?

15 A I've not seen this form before, but I  
16 believe we do the scoring based on the behavior and  
17 the records that we have at the facility, and then  
18 we make a recommendation to MDOC.

19 Q Okay. Okay. Is MDOC responsible for  
20 changing classifications of inmates?

21 A Yes.

22 Q Okay. So if they got this sheet and it  
23 met a certain threshold to take an inmate from  
24 medium, say, in this case, to close custody, would  
25 that be something they would have to change

CERTIFICATE OF REPORTER

I, MOLLY B. EATON, Certified Shorthand Reporter and Notary Public in and for the State of Mississippi, do hereby certify that the above and foregoing pages contain a full, true and correct transcript of the 30(b)(6) deposition of MANAGEMENT & TRAINING CORPORATION given by representative MARJORIE BROWN, taken in the aforementioned case at the time and place indicated, which proceedings were recorded by me to the best of my skill and ability.

I also certify that I placed the witness under oath to tell the truth and that all answers were given under that oath.

I certify that I have no interest, monetary or otherwise, in the outcome of this case.

This the 16th day of May, 2017.

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MOLLY B. EATON, RPR  
CCR #1722

My Commission Expires:

June 12, 2020